

## REMARKS

This is intended as a full and complete response to the Final Office Action dated August 25, 2004, having a shortened statutory period for response set to expire on November 25, 2004. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-26 are pending in the application. Claims 1-26 remain pending following entry of this response. Claims 1, 3, 7-12, 13 and 16-23 have been amended to more clearly recite features of the claimed invention. Applicants submit that no new matter has been introduced by the amendment.

Claims 1, 2, 4-9, 12, 14-17, 19, 21, 22 and 24-26 stand rejected under 35 U.S.C. § 102(b) as being anticipated *Ding* (U.S. Pat. No. 5,883,823). Applicants respectfully traverse this rejection. *Ding* discloses a partial odd/even indexing of a coefficient matrix in computing regional inverse discrete cosine transform (IDCT) coefficients. However, the computed IDCT coefficients do not represent odd/even indexes of the original coefficient matrix, and *Ding* does not teach, show or suggest storing odd/even index sequences of the computed regional IDCT coefficients. Therefore, Applicants submit that *Ding* does not teach, show or suggest storing odd/even sequences of an  $i$  by  $j$  matrix in a data storage device, as claimed in the independent claims 1, 12 and 19. Reconsideration of this rejection is requested.

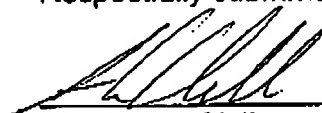
Claims 3, 10, 11, 13, 18, 20 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Oyamada et al.* (U.S. 5,617,333, hereinafter *Oyamada*) and *Ding*. The Examiner takes the position that it would have been obvious to one skilled in the art at the time of the invention was made to modify the image processing system of *Ding* to use the system of estimating blocks disclosed in *Oyamada*. Applicants respectfully traverse this rejection.

*Oyamada* discloses an image data transmission system having a transmitter section which partitions an image data into a predetermined number of data blocks and a receiving section which detects and corrects transmission-caused errors in the received data blocks. *Ding*, as discussed above, does not teach, show or suggest storing odd/even sequences of an  $i$  by  $j$  matrix in a data storage device.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974), MPEP § 2143.03. Applicants contend that the references cited by the Examiner do not teach, show or suggest all of the claim limitations. In particular, the references do not teach, show or suggest storing odd/even index sequences of a matrix representing multimedia data and/or reconstructing the matrix utilizing odd/even index sequencing. Although *Oyamada* discloses partitioning data into logical blocks and *Ding* discloses discrete cosine transform coefficients in a matrix, these references, alone or in combination, do not teach, show or suggest storing and retrieving odd/even index sequences of a matrix representing the multimedia data in a storage device, particularly a hard disk drive with the data recovery procedure disabled. In response to the sections of *Ding* indicated by the Examiner, Applicants contend that decompressing an image does not equate to restructuring a matrix utilizing odd/even index sequencing of the matrix. Therefore, Applicants submit that claims 3, 10, 11, 13, 18, 20 and 23 are patentable over *Oyamada* and *Ding* and respectfully requests withdrawal of the rejection.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



Gero G. McClellan  
Registration No. 44,227  
MOSER, PATTERSON & SHERIDAN, L.L.P.  
3040 Post Oak Blvd. Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Applicant(s)